

Principal Financial Group

RECEIVED
FEC MAIL
OPERATIONS CENTER

2003 DEC 23 A 9:53

Affiliated Insurance Company Political Action Committee

December 17, 2003

Kristine Adams
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

RE: Identification Number C00128918
March Monthly Report (02/01/2003 - 02/28/2003)

Dear Ms. Adams:

This is in response to your letter of November 19, 2003 concerning candidate contributions made which exceeded the \$5,000 aggregate contribution limit set forth in the Act, 2 U.S.C. §441a(a). Specifically at issue are the following contributions:

- \$1,500 contribution made to Friends of Baucus on September 13, 2002
- \$1,000 contribution made to Nussle for Congress on September 5, 2002
- \$500 contribution made to Nussle for Congress on October 17, 2002

Your November 19, 2003 letter notes the refund of the \$500 contribution to Nussle for Congress as disclosed on our June 2003 Monthly report. We believe this remedy meets with the satisfaction of the Commission and we consider the issue closed with regard to this contribution.

As you know, the \$1,500 contribution to Friends of Baucus and the \$1,000 contribution to Nussle for Congress were redesignated to the Primary election, as disclosed in our March monthly report (02/01/2003 - 02/28/2003). We understood this to be a satisfactory remedy of the situation, per our discussions with the Commission; however as described in your November 19, 2003 letter, we understand we are required to request refunds of these contributions.

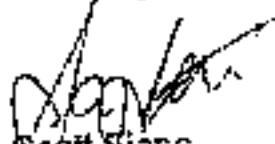
In accordance with your November 19, 2003 letter, we have sent written requests to the campaign committees of Senator Baucus to refund the \$1,500 and Representative Nussle to refund the \$1,000 contribution amounts to us. A copy of these requests is enclosed. After receipt of these refunds, we will disclose the refunded contributions on Schedule A supporting line 16 of the appropriate FEC report(s).

PrinPac Treasurer, Government Relations Department
Principal Financial Group
Des Moines, IA 50312-0020 515.266.0911

Our failure to properly designate these contributions was an oversight. As mentioned in our January 28, 2003 letter to you, we have implemented stricter audit procedures and are confident these procedures will enable us to ensure all future contributions are properly allocated and remain within permitted limits.

Please let us know if you have any additional questions or concerns with regard to this matter. Thank you.

Sincerely,



Scott Fiene
PrinPac Treasurer
515-248-2146

Enclosures

s:\h022\hlm\prinpac\121703ka

Principal Financial Group*



Principal Life Insurance Company Political Action Committee

December 17, 2003

Friends of Max Baucus
203 C Street, NE
Washington DC 20002

Board of Directors
Executive Committee
Chair

Terry Pick

Vice Chair

Don Werner

Treasurer

Scott Fiene

Secretary

Martha Shepard

Chair Emeritus

Karen Helzer

Directors

Dexter Berlin

Stuart Betts

Art Fikson

Kristen Gibson

Jim Jang

Barbara Mueller

Merle Pedersen

Michael Treinen

RE: September 13, 2002 Campaign Contribution
February 3, 2003 Redesignation Request

Dear Madam or Sir:

Regarding the above referenced issue, as a courtesy, we have tried to contact you via phone and have left several messages, but haven't received a return call. The Federal Election Commission has notified PrinPac, the PAC of Principal Life Insurance Company, that during 2002, PrinPac exceeded the contribution limit of \$5,000 per election. Specifically, the Commission is concerned with the campaign contribution of \$1,500, originally made by PrinPac to the Friends of Max Baucus Committee on September 13, 2002.

You'll recall that on February 3, 2003, PrinPac requested to you that this \$1,500 contribution be redesignated from a General Election contribution to a Primary Election contribution. The Commission now states that the contribution may not be redesignated as requested, as the request for redesignation must be made within 60 days of the candidate committee treasurer's receipt of our contribution. 11CFR § 110.2(b).

As directed by the FEC, please refund this \$1,500 contribution amount to us at your earliest convenience. We apologize for any inconvenience this may cause and are confident our newly revised audit procedures will ensure proper designations in the future. Thank you very much for your assistance in this matter.

Sincerely,

Scott Fiene
PrinPac Treasurer
515-248-2146

s:\H022\h022\prinpac\121703m3b

Principal Financial Group®



Principal Life Insurance Company, Principal Agency Company

December 8, 2003

Nussle For Congress Committee
 Attn: Tammy Werger
 P. O. Box 324
 Manchester, IA 52057

Board of Directors
 Executive Committee

Chair
 Doug Back
 Vice Chair
 Dan Werner
 Treasurer
 Scott Fiene
 Secretary
 Martha Shepard
 Chair, Education
 Karen Hutter

Directors
 Dexter Babin
 Stuart Brats
 Art Pilean
 Robin Gibson
 Jim Lang
 Barbara Mueller
 Mole Pedersen
 Michael Teisen

RE: September 5, 2002 Campaign Contribution
 February 3, 2003 Redesignation Request

Dear Ms. Werger:

As a follow-up to your phone conversation on December 9, 2003 with Jill Kempkes in our Government Relations department, the Federal Election Commission notified PrinPac, the PAC of Principal Life Insurance Company, that during 2002, PrinPac exceeded the contribution limit of \$5,000 per election. Specifically, the Commission is concerned with the campaign contribution of \$1,000, originally made by PrinPac to the Nussle Committee on September 5, 2002.

You'll recall that on February 3, 2003, PrinPac requested to you that this \$1,000 contribution be redesignated from a General Election contribution to a Primary Election contribution. The Commission now states that the contribution may not be redesignated as requested, as the request for redesignation must be made within 60 days of the candidate committee treasurer's receipt of our contribution. 11CFR § 110.2(b).

As directed by the FEC and as discussed with Jill, please refund this \$1,000 contribution amount to us at your earliest convenience. We apologize for any inconvenience this may cause and are confident our newly revised audit procedures will ensure proper designations in the future. Thank you very much for your assistance in this matter.

Sincerely,

Scott Fiene
 PrinPac Treasurer
 515-248-2146

etihJ224miprinpacd120963hwjn

PrinPac Treasurer, Government Relations Department
 Principal Financial Group®
 One American Lane, Des Moines, IA 50319-5001

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

☐

Hand Delivered

Date of Receipt

☒

First Class Mail

POSTMARKED

12-15-03

☐

Registered/Certified Mail

POSTMARKED (R/C)

☐

No Postmark

☐

Postmark Illegible

☐Received from the House office of Records
and Registration

Date of Receipt

☐Received from the Senate Office of Public
Records

Date of Receipt

☐

Other (Specify):

Postmarked

and/or Date of Receipt

☐

Electronic Filing



PREPARER

12-23-03

DATE PREPARED